

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x,  
OLABISI SALIS

07 CV 6164

Plaintiff,

-against-

AMERICAN EXPORT LINES  
ATLANTIC CONTAINER LINE

ANSWER TO  
CROSS-CLAIM WITH  
AFFIRMATIVE DEFENSES

Defendants.

-----x

Defendant ATLANTIC CONTAINER LINE (ACL) answers the Cross-Claim of defendant AMERICAN EXPORT LINES upon information and belief as follows:

FIRST: Defendant ACL denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "1" of co-defendant AMERICAN EXPORT LINES' Cross-Claim.

SECOND: Defendant ACL denies each and every allegation contained in paragraph "2" co-defendant AMERICAN EXPORT LINES' Cross-Claim.

AS AND FOR A FIRST SEPARATE AND COMPLETE AFFIRMATIVE DEFENSE

THIRD: Defendant, ACL repeats, reiterates and makes applicable to Co-defendant AMERICAN EXPORT LINES' Cross Claim each Separate and Complete Affirmative defense in ATLANTIC CONTAINER LINE's Answer to plaintiff's Complaint as if specifically set forth herein at length.

WHEREFORE, defendant ACL demands judgment dismissing the Cross Claim herein and awarding defendant ACL costs, fees, including reasonable attorneys fees and disbursements of this action, and further demands judgment against the co-defendant AMERICAN EXPORT LINES for all sums which may be recovered by plaintiff against the defendant ACL, costs, fees including reasonable attorneys fees and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

Dated: New York, New York  
August 13, 2007

Respectfully submitted,

MAHONEY & KEANE, LLP  
Attorneys for Defendant  
ATLANTIC CONTAINER LINE

By:

  
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